

Response to USEPA Comments Received October 16, 2012 to the Draft QAPP Background Sediment Addendum dated September 14, 2012

No.	Section	General Comment	Response
1	General Comment	None of the sampling locations should be near a CSO or other point source. CDM, EPA directly, and/or the partner agencies will provide oversight in the field to assure that this doesn't happen. Language in the QAPP addendum referring to the reconnaissance effort should be revised throughout to reflect this.	The QAPP Addendum and schedule have been globally updated to state that USEPA oversight will be present during the site reconnaissance survey, and target sampling locations will not be identified in areas near a CSO or other potential point sources.
2	General Comment	Errors were made during the previous toxicity testing efforts that should not be repeated. EPA's comments on the January 31, 2012 Toxicity Testing Report were submitted on September 24, 2012, and should be reviewed prior to conduct of this effort.	CPG is not aware of any errors that call into question the quality of the toxicity data. CPG asks for specifics regarding this comment. There was a question about conducting a static vs. a static-renewal test for <i>Ampelisca</i> , but please note static-renewal was agreed to in the USEPA-approved QAPP, and this protocol was followed by both CPG and USEPA toxicity labs. Also note the <i>Ampelisca</i> test is conducted with marine/estuarine sediments, which is not the focus of this particular QAPP Addendum. The proposed toxicity tests are <i>Hyalella</i> and <i>Chironomus</i> tests using freshwater sediments.
3a	Introduction, Page 1	At the end of the second paragraph, add the following sentence: Additional upstream background and/or reference sampling efforts may be required.	Sentence has been added.
3b	Introduction, Page 1	In the 3rd paragraph, add that the reconnaissance will also be used to assure, to the extent possible, that none of the sampling locations are near a CSO or other point source.	Sentence has been added.
4	Worksheet 3, Page 8	Bill Sy's phone number should be changed to (732) 321-6648.	Phone number has been changed.
5	Worksheet 10, Page 13, First Paragraph	The text states that "ongoing inputs of chemical and environmental stressors originating from areas both inside and outside the LPRSA need to be taken into account during the risk assessment and remedial decision-making processes." Reference to environmental stressors should be removed, as the focus of the risk assessment process is on chemical stressors.	Language "and environmental stressors" has been deleted.
6a	Worksheet 10, Page 13, Last Paragraph	Recommend that the second sentence "Due to the extent of regional estuarine surface sediment chemistry data..." be changed to read "Due to the amount of regional estuarine surface sediment chemistry data..."	Consistent with the comments on the Tissue QAPP Addendum, the first three sentences of this paragraph that reference Appendix B (including the sentence referred to in this comment) have been deleted.
6b	Worksheet 10, Page 13, Last Paragraph	State that existing data "may" be used to establish the estuarine background data set, rather than "will" be used. This is still under consideration.	Consistent with the comments on the Tissue QAPP Addendum, the first three sentences of this paragraph that reference Appendix B (including the sentence referred to in this comment) have been deleted.

6c	Worksheet 10, Page 13, Last Paragraph	At the end of the paragraph, add a sentence stating that collection and/or review of additional freshwater background and/or reference data may be required.	Sentence has been added.
7a	Worksheet 10, Page 14	In the Observations from any site reconnaissance report section, state that the reconnaissance effort will also be used to assure, to the extent possible, that none of the sampling locations are near a CSO or other point source.	The following sentences have been added: "USEPA oversight will be present during the site reconnaissance survey to identify target sampling locations. Target sampling locations will not be identified in areas near a CSO or other potential point sources."
7b	Worksheet 10, Page 14	In the "A synopsis of secondary data or information from site reports" section, state that some of the regional estuarine data "may be" of sufficient quality and quantity to be used to establish background and reference conditions for the estuarine portion of the LPRSA, rather than "are." This comment applies to the "Information concerning various environmental indicators" section on Page 16.	Consistent with the comments on the Tissue QAPP Addendum, the sentence stating that "regional estuarine data are of sufficient quality...." has been deleted. The following sentence has been added under "Information concerning various environmental indicators:" "The need for additional sediment collection efforts to obtain background and/or reference data from estuarine environments in the LPR region may be required, but such a collection effort is not described in this QAPP Addendum," and additional edits were made to this text in this section consistent with the Tissue QAPP Addendum.
8	Worksheet 11, Pages 17 to 18	In the "What will the data be used for" section, please state explicitly that neither background nor reference data results will be subtracted from the concentrations detected in the LPRSA, and that they will not be used to lower either the human health or ecological risks calculated for the LPRSA.	CPG intends to follow relevant USEPA guidance (e.g., USEPA (2002), USEPA (1994)) on the use of background and reference data in the baseline risk assessment. In <i>Role of Background in the CERCLA Cleanup Program</i> (USEPA 2002) it states, "the COPCs with high background concentrations should be discussed in the risk characterization, and if data are available, the contribution of background to site concentrations should be distinguished." This document further states "The Risk Characterization should include a discussion of elevated background concentrations of COPCs and their contribution to site risks." Therefore, consistent with USEPA guidance, the following sentence has been added to Worksheet 11 under the "What will the data be used for" section: "Consistent with USEPA guidance the Risk Characterization, in addition to presenting LPRSA risks, will present a discussion of the contribution of background and reference concentrations to site risks."

9	Worksheet 11, Page 20	After the reconnaissance survey, please clarify the sampling approach if the sampling design of having 3 fine-grained and 3 coarse-grained SQT locations per segment cannot be achieved. Will the sampling design of having 6 samples per segment still be adhered to?	Yes – the sampling design of six samples will be adhered to regardless of whether the targeted grain size can be achieved. The following sentence has been added to the end of the third paragraph under “Where, when, and how should the data be collected/generated?”: “Regardless of whether the targeted number of grain size sampling locations can be achieved per segment for SQT sampling (i.e., three fine-grained and three coarse-grained locations per segment), a total of six samples will be collected from each segment to ensure adequate spatial coverage for SQT sampling.”
10	Worksheet 14, Page 27	Under the QC tasks, Worksheet 28 should also be included in the list of worksheets that the laboratories should follow. Worksheet 28 includes QC samples performance criteria and corrective actions required of the laboratories.	Worksheet 28 has been added to the list of worksheets that describe QC procedures for the analytical laboratories.
11	Worksheet 20, Page 42	Recommend adding the sediment toxicity tests and benthic invertebrate taxonomy (SOPs M36, 37, 42, 43) to this worksheet and indicate if they require QC samples.	Sediment toxicity tests and benthic invertebrate taxonomy have been added to Worksheet 20 to summarize the field QC samples.
12	Worksheet 23	Some inconsistencies were noted on Worksheet 23 between the SOP revisions provided in the Final 2009 Surface Sediment Chemical Analysis and Benthic Invertebrate Toxicity and Bioaccumulation Testing QAPP and the 2012 Addendum 5 for the following SOP references. Please update and revise as needed. <ul style="list-style-type: none"> SOP M34 (TPH SOP ID 2126 (04-13)) has Revision 2 dated 4/27/12 in addendum 5 and Revision 3 dated 7/4/07 in the 2009 QAPP. SOP M43 (Alkylated PAHs SOP ID 2247(O-008)) has Revision 4 dated 8/10/12 in addendum 5 and Revision 4 dated 10/8/08 in the 2009 QAPP. SOP M47 (TPH-alkanes SOP ID 2246 (O-003)) has Revision 4 dated 4/11/12 in addendum 5 and Revision 4 dated 10/28/08 in the 2009 QAPP. SOP M48 (TPH-alkanes SOP ID 2261 (OP-013)) has Revision 2 dated 3/22/12 in addendum 5 and Revision 2 dated 10/22/08 in the 2009 QAPP. SOP M49 (percent moisture, grain size SOP ID 1754 (G-003)) has Revision 2 dated 3/2/12 in addendum 5 and Revision 2 dated 1/31/08 in the 2009 QAPP. 	Alpha Analytical revised its SOP numbering system after the 2009 Surface Sediment Chemical Analysis and Benthic Invertebrate Toxicity and Bioaccumulation Testing QAPP was finalized. The new SOP numbers are included, and the older SOP numbers are also provided in parentheses for reference purposes in Worksheet 23 of the Benthic QAPP Addendum No. 5. The revised SOP number reflects only the revisions made to the SOP under the new numbering scheme (i.e., revision numbers did not continue sequentially from the original SOP). The revision dates and numbers for SOP M34, M43, M47, M48, and M49 are consistent with the SOPs provided in Attachment M. Footnote C has been added to Worksheet 23 to further clarify that Alpha Analytical changed its SOP numbering scheme, and that the revised number reflects only the revisions made to the SOP under the new numbering scheme.
13	Worksheet 36, Page 64	Worksheet 28 should also be included to the list of worksheets that will be used as part of the validation process.	Worksheet 28 had been added to the list of worksheets that will be used as part of the validation process.

USEPA. 1994. Selecting and using reference information in Superfund ecological risk assessments. ECO Update bulletin 2(4). Publication 9345.0-10, EPA 540/F-94/050. Office of Emergency and Remedial Response, US Environmental Protection Agency, Washington, DC.

USEPA. 2002. Role of background in the CERCLA cleanup program. OSWER 9285.6-07P. Office of Solid Waste and Emergency Response, Office of Emergency and Remedial Response, US Environmental Protection Agency, Washington, DC.